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**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**BILLINGS DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 17-117-BLG-SPW</b>
<b>Plaintiff,</b>	
<b>vs.</b>	
<b>CHRISTINA ANN JACKSON</b>	<b>OFFER OF PROOF</b>
<b>Defendant.</b>	

The defendant, Christina Ann Jackson, has signed a plea agreement which contemplates her plea of guilty to Count I of the Indictment, charging her with Transportation of a Person with Intent to Engage in Criminal Sexual Activity in violation of 18 U.S.C. § 2421. This offense carries a maximum term of ten years imprisonment, a \$250,000 fine, three years of supervised release, and a \$5,000 special assessment. Restitution is mandatory.

At the time of sentencing, the United States will move to dismiss Counts II and III of the Indictment provided the plea agreement is accepted by the Court.

The United States presented all formal plea offers to the defendant in writing. The plea agreement entered into by the parties and filed with the court represents, in the government's view, the final and the most favorable offer extended to the defendant. *See Missouri v. Frye*, 566 U.S. 134, 145-46 (2012).

*Elements.* In order to prove the case against the defendant at trial, the United States would have to prove the following elements beyond a reasonable doubt:

First, the defendant knowingly transported a person in interstate or foreign commerce; and

Second, the defendant transported a person with the intent that such person engage in prostitution or any sexual activity for which a person can be charged with a criminal offense.

Under the laws of the State of Montana, Montana Code Annotated, § 45-5-601, and the laws of the State of North Dakota, North Dakota Code Annotated, § 12.1-29-03, prostitution is illegal.

*Proof.* If called upon to prove this case at trial, and to provide a factual basis for the defendant's plea, the United States would present, by way of witnesses and documentary evidence, the following:

1. On October 9, 2015, the Montana Human Trafficking Working Group was conducting in operation in Billings, Montana. The undercover agent working the operation contacted M.M. to set up a “date” with M.M. After contact was made with M.M. at the Vegas Motel at roughly 9:45 pm, she was subsequently interviewed at the FBI office. She stated that she was from Boise, Idaho and had begun working in commercial sex with the defendant. She informed law enforcement that the defendant had previously taken her from Idaho to Montana and North Dakota for the purpose of commercial sex. M.M. stated that one such trip occurred in June 2014. M.M. explained the defendant drove during this trip and the reason for the trip was to engage in commercial sex. Backpage ads for M.M. in Montana and North Dakota during this period were discovered by law enforcement.
2. Also interviewed on or about October 9, 2015, was T.R. She also informed law enforcement that she had previously been transported by the defendant from Idaho to Montana and North Dakota for the purpose of commercial sex. Law enforcement would discover Backpage ads for T.R.

3. On May 11, 2016, the defendant was interviewed by law enforcement. She stated the following.

- She became involved in the “game” by learning from a friend of hers from Boise, Idaho.
- She acknowledged going on 3-4 trips to North Dakota for purposes of commercial sex and driving through Montana every time. While she said she posted ads in Billings, she claimed never to have engaged in commercial sex in Montana. She did however, admit to law enforcement that she engaged in commercial sex in North Dakota.
- She did acknowledge taking T.R. and T.M. to North Dakota (through Montana) for purposes of commercial sex.

4. During the relevant period, prostitution was illegal in both Montana and North Dakota.

DATED this 6th day of August, 2018.

KURT G. ALME  
United States Attorney

/s/ Zeno B. Baucus  
ZENO B. BAUCUS  
Assistant United States Attorney